

Law Offices of
VIJAYANT PAWAR, ESQ. (7642)
35 Airport Road, Suite 330
Morristown, New Jersey 07960
Tel.: (973) 267-4800
Fax: (973) 215-2882
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PURE TECH SYSTEMS, INC.

Plaintiff,

vs.

KEMPER ENVIRONMENTAL LTD, and
KEMPER INDEMNITY INSURANCE
COMPANY,

Defendants.

Hon. Richard M. Berman

Civil Action No. 07-7065 (RMB)(MHD)

**NOTICE OF MOTION FOR
ADMISSION OF PAULA M.
JOHNSON-BACON AND TRISHA
MARIE BENSON PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern District of New York, I, Vijayant Pawar, a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

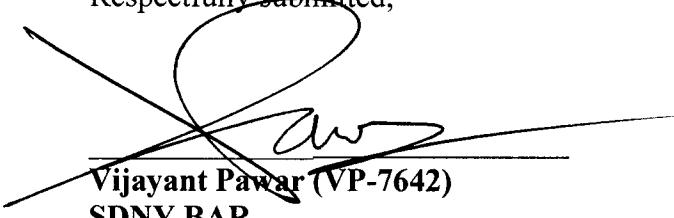
Applicant's Name: PAULA M. JOHNSON-BACON
Firm Name: GIARMARCO, MULLINS & HORTON, P.C.
Address: 101 W. BIG BEAVER ROAD, 10TH FLOOR
City/State/Zip: TROY, MI 48084-5280
Phone Number: (248) 457-7000
Fax Number: (248) 457-7001

Applicant's Name: TRISHA MARIE BENSON
Firm Name: GIARMARCO, MULLINS & HORTON, P.C.
Address: 101 W. BIG BEAVER ROAD, 10TH FLOOR
City/State/Zip: TROY, MI 48084-5280
Phone Number: (248) 457-7000
Fax Number: (248) 457-7001

PAULA M. JOHNSON-BACON and TRISHA MARIE BENSON are members in good standing of the Bar of Michigan. There are no pending disciplinary proceedings against PAULA M. JOHNSON-BACON or TRISHA MARIE BENSON in any State or Federal court.

Dated: February 4, 2008
Morristown, New Jersey

Respectfully submitted,


Vijayant Pawar (VP-7642)
SDNY BAR
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35 Airport Road, Suite 330
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Hon. Richard M. Berman

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**CERTIFICATION OF COUNSEL OF
RECORD IN SUPPORT OF
APPLICATION FOR
ADMISSION OF PAULA M.
JOHNSON-BACON AND TRISHA
MARIE BENSON PRO HAC VICE**

VIJAYANT PAWAR, being duly sworn, hereby deposes and says as follows:

1. I am VIJAYANT PAWAR, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Paula M. Johnson-Bacon and Trisha Marie Benson as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in September 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. Paula M. Johnson-Bacon and Trisha Marie Benson are attorneys at Giarmarco, Mullins & Horton P.C., in Troy, Michigan and are associates of Sean M. Walsh, who has been admitted pro hac vice in this matter.
4. I have found Paula M. Johnson-Bacon and Trisha Marie Benson to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.

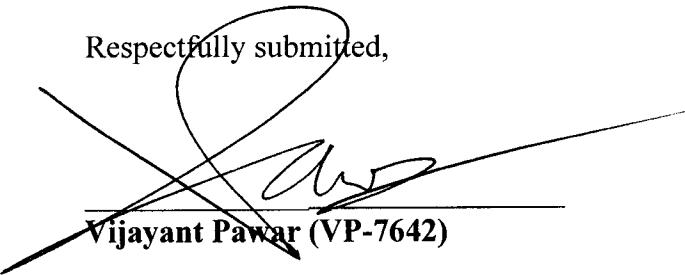
5. Accordingly, I am pleased to move the admission of Paula M. Johnson-Bacon and Trisha Marie Benson, pro hac vice.

6. I respectfully submit a proposed order granting the admission of Paula M. Johnson-Bacon and Trisha Marie Benson, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Paula M. Johnson-Bacon and Trisha Marie Benson, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: February 4, 2008

Respectfully submitted,


Vijayant Pawar (VP-7642)

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COMPANY,

Defendants.

Hon. Richard M. Berman

Civil Action No. 07-7065 (RMB)(MHD)

**ORDER ALLOWING
ADMISSION OF PAULA M.
JOHNSON-BACON AND TRISHA
MARIE BENSON PRO HAC VICE**

Upon the motion of VIJAYANT PAWAR, attorney for PURE TECH SYSTEMS, INC. and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Applicant's Name:	PAULA M. JOHNSON-BACON
Firm Name:	GIARMARCO, MULLINS & HORTON, P.C.
Address:	101 W. BIG BEAVER ROAD, 10 TH FLOOR
City/State/Zip:	TROY, MI 48084-5280
Phone Number:	(248) 457-7000
Fax Number:	(248) 457-7001

Applicant's Name:	TRISHA MARIE BENSON
Firm Name:	GIARMARCO, MULLINS & HORTON, P.C.
Address:	101 W. BIG BEAVER ROAD, 10 TH FLOOR
City/State/Zip:	TROY, MI 48084-5280
Phone Number:	(248) 457-7000
Fax Number:	(248) 457-7001

ARE admitted to practice pro hac vice as counsel for PURE TECH SYSTEMS, INC. in the above captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

DATED:

United States District/Magistrate Judge

CERTIFICATION OF SERVICE

I, Vijayant Pawar, Esq, a member of the Bar of this Court, hereby certify that a copy of the within Motion was served this day by regular mail upon counsel for Defendant, David M. Pollack, Esq., Donovan Hatem LLP, One Penn Plaza, 250 W 34th Street, Suite 3324, New York, New York 10119

Law Offices of
VIJAYANT PAWAR

Attorneys for Plaintiff
BY: 
VIJAYANT PAWAR (VP-7642)

DATED: February 4, 2008

State Bar of Michigan

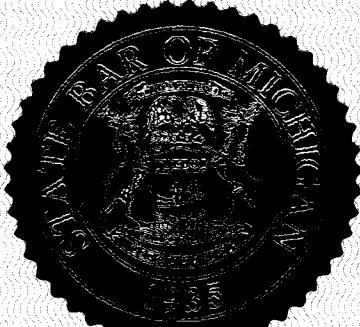
Certificate of Good Standing



This certifies that Paula M. Johnson-Bacon, P55862 of Troy, Michigan is an active member of the State Bar of Michigan in good standing.

She was admitted to practice in Michigan on November 8, 1996 in Oakland County and became a member of the State Bar of Michigan on November 27, 1996.


Janet K. Welch
Executive Director
January 31, 2008



State Bar of Michigan

Certificate of Good Standing



This certifies that Trisha Marie Benson, P68207 of Troy, Michigan is an active member of the State Bar of Michigan in good standing.

She was admitted to practice in Michigan on May 20, 2005 in Oakland County and became a member of the State Bar of Michigan on May 23, 2005.


Janet K. Welch
Executive Director
January 31, 2008

